

Talking Points

CA UIC Briefing for RA – July 20 14, 2016

- * Our last briefing for you on the CA UIC program was in March 2016
- * Key developments: Received only one formal AE proposal; one other informally during State's public comment period. Meetings with key industry groups.

Cover 2 main topics - Aquifer Exemptions and Overall Program Compliance

Aq. Exemptions

- **AE Compliance Schedule regulations;** emergency regulations in place (Apr 2015; expire July 2016); permanent rulemaking initiated in May 2015, DOGGR working to finalize before expiration of Emerg. Regs [Oct 2015 for disposal in sub-3,000; Dec. 2016 for HTAE; and Feb 2017 for the rest]

- **Overall picture/status for AEs:** about 532 disposal wells and 5,625 EOR wells (6,150+) [[Share chart](#)]

Reduced to 336 (out of 532) disposal wells + 5,587 (out of 5,625) EOR wells = 5,923 wells

Wells covered by packages that we have or are scheduled to go to WB by May 2016 = 4,455

Wells covered by packages with no specified timeframe for going to the WB = 1,279

5,734 wells (out of 5,923 wells - ~97%)

State messaging that packages not out for PN by August 15, 2016 will not make it (our Compliance Schedule included Aug 15, 2016 as a target for 90% of proposed AEs submitted to EPA). Overall expecting ~20-25 AE packages – 15 from Inland District.

- **Arroyo Grande AE Request:** Letter from Mike April 17, 2016 requesting additional information; held informal discussions regarding their proposed responses. Awaiting DOGGR's formal response. Supplemental information will require opportunity for public input – public comment period and/or hearing.

- **Round Mountain AE Request:** Provided informal comments during site visits in Bakersfield. DOGGR received public comments, will respond and re-open comment period for 15 additional days. EPA's comments should be addressed in revised materials.

- **Fruitvale and Tejon AE Requests** – Presentations made to EPA, informal feedback provided. EPA consultant will review during public comment period, as with Round Mountain. Looking to stage EPA reviews earlier in the process so less chance of re-opened public comment period.

Overall Program Compliance

- **UIC Program Rulemaking:** 1st phase of rulemaking to address shortcomings in UIC program identified by EPA and to modernize and improve their UIC rules – defining USDW, standards/permitting for cyclic steaming, MIT requirements, standards/process for establishing max injection pressure. [EPA comments on AOR for cyclic steam wells; USDW defn, and clarifying gas storage wells not UIC regulated]

- **Project-by-project reviews:** State plan to review all approved projects arose out of the Cypress report; Renewal Plan

timeframe said initiate in Fall 2015 and complete all reviews by April 2017, with PAL review/revision as they go (Aliso Canyon event); we are continuing to work with the state to prioritize (e.g., disposal wells; wells in fresher aquifers; projects with no AOR...); the idea is to incorporate some products/milestones into Compliance Plan

- **Class II UIC Database (WellSTAR)**: State tracking and reporting system; proof of concept began in January 2016; using an accepted Class II dbase platform developed by GWPC and tailoring it for CA.

-Ongoing updates for House of Representatives – McCarthy and Capp.

-Meetings with CIPA, and WSPA

-ProPublica FOIA